

MSE:

AO 91 (Rev. 11/11) Criminal Complaint

2020R00251

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-mj-358 HB

SAMUEL ELLIOTT FREY

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 28, 2020, in St. Paul, in the State and District of Minnesota, defendant SAMUEL ELLIOTT FREY conspired with Co-Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3 to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, 844(i), all in violation of Title 18, United States Code, Section 371 (Count 1); and defendant SAMUEL ELLIOTT FREY has attempted to destroy by fire property used and engaged in interstate commerce, in violation of Title 18, United States Code, Section 844(i) (Count 2).

I further state that I am an ATF Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No


Complainant's signature

Laura Gulick, ATF Special Agent
Printed name and title


Judge's Signature
The Honorable Hildy Bowbeer
United States Magistrate Judge
Printed Name and Title

Date: June 8, 2020City and State: St. Paul, MN